

EXHIBIT C

Andrew Russell

From: David Chavous <dchavous@chavousiplaw.com>
Sent: Monday, October 4, 2021 4:06 PM
To: Rachael Lamkin
Cc: Stamatios Stamoulis; Meghan James; Anissa Davidson; Richard C. Weinblatt; Andrew Russell
Subject: RE: CA No. 19-1109-MN Rothschild Digital Confirmation, LLC. v. CompanyCam, Inc. - Letter

Categories: Filed

Hello Rachael,

I cannot provide for their production. I have been terminated as counsel. I can pass along your request but I cannot make any argument or representation on behalf of RDC.

Best,

Dave

From: Rachael Lamkin <rdl@lamkinipdefense.com>
Sent: Monday, October 4, 2021 4:04 PM
To: David Chavous <dchavous@chavousiplaw.com>
Cc: Stamatios Stamoulis <stamoulis@swdelaw.com>; Meghan James <mjames@shawkeller.com>; Anissa Davidson <adavidson@chavousiplaw.com>; Richard C. Weinblatt <weinblatt@swdelaw.com>; Andrew Russell <arussell@shawkeller.com> <arussell@shawkeller.com>
Subject: Re: CA No. 19-1109-MN Rothschild Digital Confirmation, LLC. v. CompanyCam, Inc. - Letter

Dave,

No, please provide for their production. I can provide a DropBox folder for your client's convenience. Just let me know.

Best regards,

Rachael

Rachael Lamkin
Lamkin IP Defense
916.747.6091
<https://www.lamkinipdefense.com/rachael-1/>

On Mon, Oct 4, 2021 at 1:01 PM David Chavous <dchavous@chavousiplaw.com> wrote:

Rachael,

Per the responses, the documents are being made available for inspection. Will you be inspecting the documents at the location identified in the responses?

Thank you.

Dave

From: Rachael Lamkin <rdl@lamkinipdefense.com>
Sent: Monday, October 4, 2021 3:41 PM
To: Stamatios Stamoulis <stamoulis@swdelaw.com>
Cc: Meghan James <mjames@shawkeller.com>; Anissa Davidson <adavidson@chavousiplaw.com>; David Chavous <dchavous@chavousiplaw.com>; Richard C. Weinblatt <weinblatt@swdelaw.com>; Andrew Russell (arussell@shawkeller.com) <arussell@shawkeller.com>
Subject: Re: CA No. 19-1109-MN Rothschild Digital Confirmation, LLC. v. CompanyCam, Inc. - Letter

Stam, David,

Mr. Rothschild's discovery responses were delivered to my office late friday. I attach them here. As you can see, they are not adequately answered. Pursuant to Judge Norieka's Order, we need fulsome responses and documents produced.

Best regards,

Rachael

Rachael Lamkin

Lamkin IP Defense

916.747.6091

<https://www.lamkinipdefense.com/rachael-1/>

On Wed, Sep 29, 2021 at 3:59 PM Stamatios Stamoulis <stamoulis@swdelaw.com> wrote:

Hi Rachael,

This is an unusual situation. As I told Andrew during our meet and confer, David and I were terminated on 9/24.

Today, we learned from the clerk of the court that RDC attempted to file a notice of service for discovery responses it served itself.

The notice stated RDC apparently served its responses on the following address:

Rachael D. Lamkin
One Harbor Drive, Suite 304
Sausalito, California, 94965

Thank you, Stam

From: Rachael Lamkin <rdl@lamkinipdefense.com>
Sent: Wednesday, September 29, 2021 6:52 PM
To: Stamatios Stamoulis <stamoulis@swdelaw.com>
Cc: Meghan James <mjames@shawkeller.com>; adavidson@chavousiplaw.com; David Chavous <dchavous@chavousiplaw.com>; Richard C. Weinblatt <weinblatt@swdelaw.com>; Andrew Russell (arussell@shawkeller.com) <arussell@shawkeller.com>
Subject: Re: CA No. 19-1109-MN Rothschild Digital Confirmation, LLC. v. CompanyCam, Inc. - Letter

Stam - I have confirmed with my receptionist that no documents were served upon me or my office.

Rachael

Rachael D. Lamkin

916.747.6091

On Sep 29, 2021, at 3:18 PM, Stamatios Stamoulis <stamoulis@swdelaw.com> wrote:

Andrew,

The client stated that they served their discovery responses yesterday on Ms. Lamkin by Fed-Ex.

Were those received? If so, you may need to update or withdraw your letter to the court.

Thank you, Stam

From: Meghan James <mjames@shawkeller.com>

Sent: Wednesday, September 29, 2021 5:48 PM

To: adavidson@chavousiplaw.com <adavidson@chavousiplaw.com>; David Chavous <dchavous@chavousiplaw.com>; Richard C. Weinblatt <weinblatt@swdelaw.com>; Stamatios Stamoulis <stamoulis@swdelaw.com>

Subject: CA No. 19-1109-MN Rothschild Digital Confirmation, LLC. v. CompanyCam, Inc. - Letter

Please find attached, DI 51, **Letter to The Honorable Maryellen Noreika from Andrew E. Russell regarding Discovery Dispute - re [49] Order Setting Teleconference,,.** (Attachments: # (1) Exhibit A, # (2) Exhibit B, # (3) Exhibit C, # (4) Exhibit D, # (5) Exhibit E, # (6) Exhibit F)(Russell, Andrew), filed today.

M eghan J a m e s

Senior Litigation Paralegal

SHAW KELLER LLP

IM .Pei Building

1105 North Market Street, 12th Floor

Wilmington, DE 19801

(302) 298-0707-Telephone

(302) 300-4026-Facsimile

This email may contain PRIVILEGED and CONFIDENTIAL information and is intended only for the use of the specific individual(s) to which it is addressed. If you are not an intended recipient of this email, you are hereby notified that any unauthorized use, dissemination or copy of this email or the information contained in it or attached to it is strictly prohibited. If you have received this email in error, please delete it and immediately notify the person named above by reply email. Thank you.